IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

VALTRUS INNOVATIONS LTD.,	§ CASE NO. 2:23-cv-00443-JRG
	§ (Lead Case)
Plaintiff,	§
,	§ JURY TRIAL DEMANDED
V.	8
	8
AT&T INC., et al	\$ &
•	8
Defendants.	§
	§
	8
VALTRUS INNOVATIONS LTD.,	§ CASE NO. 2:23-cv-00445-JRG
VALIKUS INNOVATIONS LID.,	3
	§ (Member Case)
Plaintiff,	§
·	§ JURY TRIAL DEMANDED
V	
V.	8
	§
T-MOBILE COMMUNICATIONS,	§
INC., et al	8
	8
Defendants.	8
	§

JOINT MOTION TO STAY DEADLINES AND NOTICE OF SETTLEMENT WITH RESPECT TO ONEPLUS DEFENDANTS

Plaintiff Valtrus Innovations Limited ("Valtrus") and OnePlus Technology (Shenzen) Co., Ltd., and OnePlus Mobile Communications (Guangdong) Co., Ltd. (collectively, "OnePlus") submit this Joint Motion to Stay and Notice of Settlement. Valtrus and OnePlus have reached an agreement in principle to settle all matters in controversy between them and respectfully request the Court stay all unreached case deadlines with respect to OnePlus only, and not to any other defendants in the consolidated cases, for forty-five (45) days so that the parties may finalize the settlement agreement and prepare the appropriate dismissal papers for the Court.

Dated: June 7, 2024

Respectfully submitted,

/s/ Matthew G. Berkowitz w/permission Claire Henry
Matthew G. Berkowitz – LEAD ATTORNEY
Patrick R. Colsher
Navid C. Bayar
Aaron L. Morris
Reichman Jorgensen Lehman & Feldberg LLP
100 Marine Parkway, Suite 300
Redwood Shores, CA 94065
Tel: (650) 623-1401
mberkowitz@reichmanjorgensen.com
pcolsher@reichmanjorgensen.com
nbayar@reichmanjorgensen.com
amorris@reichmanjorgensen.com

Khue V. Hoang Reichman Jorgensen Lehman & Feldberg LLP 400 Madison Avenue, Suite 14D New York, NY 10017 Tel: (212) 381-1965 khoang@reichmanjorgensen.com

Of Counsel:

Andrea L. Fair Texas Bar No. 24078488 Claire Abernathy Henry Texas State Bar No. 24053063

WARD, SMITH & HILL, PLLC 1507 Bill Owens Pkwy. Longview, TX 75604 Tel: (903) 757-6400 andrea@wsfirm.com claire@wsfirm.com

Attorneys for Plaintiff

By: <u>/s/ Jeffrey J. Catalano w/permission Claire</u> Henry

Melissa R. Smith

Texas State Bar No. 07921800

GILLIAM & SMITH, LLP

303 S. Washington Ave.

Marshall, TX 75670

Telephone (903) 934-8450

Facsimile: (903) 934-9257

melissa@gillamsmithlaw.com

Jeffrey J. Catalano

SMITH, GAMBRELL & RUSSELL LLP

311 South Wacker Drive, Suite 3000

Chicago, IL 60606

Telephone: (312) 360-6000 Facsimile: (312) 360-6520 jcatalano@sgrlaw.com

Attorneys for Defendants OnePlus Technology (Shenzhen) Co., Ltd. and OnePlus Mobile Communications (Guangdong) Co., Ltd.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was filed electronically in compliance with Local Rule CV-5(a). Therefore, this document was served on all counsel who are deemed to have consented to electronic service on this 7th day of June, 2024.

<u>/s/ Claire Henry</u> Claire Henry

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for Plaintiff has met and conferred with counsel for OnePlus and that the relief requested in this motion is joint.

/s/ Claire Henry
Claire Henry